

LAW OFFICES OF DALE K. GALIPO
Dale K. Galipo (Pro Hac Vice Ca. Bar No. 144074)
Eric Valenzuela (Pro Hac Vice Bar No. 284500)
21800 Burbank Boulevard, Suite 310
Woodland Hills, CA 91367
Telephone: (818) 347-3333 | Facsimile: (818) 347-4118
Email: dalekgalipo@yahoo.com evalenzuela@galipolaw.com

GONZALEZ & FLORES LAW FIRM
Rodolfo Gonzalez, Esq. (Nevada Bar No. 12751)
Edgar Flores, Esq. (Nevada Bar No. 13130)
879 N. Eastern Ave.
Las Vegas, NV 89101
Tel: 702-778-3030 | Fax: 702-920-8657
Email: Rodolfogonzalezlaw@gmail.com Edgarfloreslaw@gmail.com

CLAGGETT & SYKES LAW FIRM
Sean Claggett, Esq. (Nevada Bar No. 008407)
Steve Lewis, Esq. (Nevada Bar No. 7064)
4101 Meadows Lane, Suite 100
Las Vegas, NV 89107
Tel: 702-655-2346 | Fax: 702-655-3763
Email: Sean@claggettlaw.com Steve@claggettlaw.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA (LAS VEGAS)**

JEANNE LLERA and JORGE L.
GOMEZ, as the appointed co-special
administrators of the estate of JORGE A.
GOMEZ; JEANNE LLERA; and JORGE
L. GOMEZ,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN
POLICE DEPARTMENT; RYAN
FRYMAN; DAN EMERTON;
VERNON FERGUSON; ANDREW
LOCHER; and DOES 1-10, inclusive,

Defendants.

Case No. 2:20-cv-01589-RFB-BNW

**STIPULATION AND ORDER TO EXTEND
DISCOVERY**

(THIRD REQUEST)

IT IS HEREBY STIPULATED BY AND BETWEEN Plaintiffs and Defendants, through their respective attorneys of record, that the Scheduling Order [Doc. # 35] be modified by continuing the expert and rebuttal disclosures by thirty (3) days. All other dates set by the Court would remain in effect. The parties believe that there is good cause for their proposed modification based on the following:

WHEREAS the parties have been diligent in conducting discovery. The parties exchanged initial disclosures and have propounded to and responded to written discovery by Defendants and Plaintiffs. The parties have also conducted numerous depositions including of the Defendant Officers, percipient witnesses and of one of the Plaintiffs. The other Plaintiff is scheduled to be deposed this Friday on July 27, 2021.

WHEREAS additional depositions still need to be taken including of some witnesses and the medical examiner who performed the autopsy. The parties remain diligent in conducting discovery and may need to incorporate information learned from any upcoming depositions into their expert reports.

WHEREAS due to the amount of depositions which still need to be taken, and as well as the availability of the witnesses, the parties anticipate that they will not be able to complete the necessary discovery and depositions by the current expert disclosure date of July 29, 2021.

WHEREAS there have been two prior requests for continuance or extension regarding discovery. Further, the parties agree that an extension would not be prejudicial to either side. Such request, if granted, would result in the following schedule:

<u>EVENT</u>	<u>CURRENT</u>	<u>PROPOSED</u>
Expert Disclosure:	07/29/21	08/30/21
Rebuttal Expert Disclosure:	08/30/21	09/29/21
Discovery Cutoff:	09/30/21	10/29/21

All other pre-trial and trial dates would remain in effect.

Respectfully submitted,

DATED: 07/27/2021

MARQUIS AURBACH COFFING

s/ Craig R. Anderson

Craig R. Anderson, Esq.
10001 Park Run Drive
Las Vegas, Nevada 89145
canderson@maclaw.com
Counsel for LVMPD Defendants

DATED: 07/27/2021

LAW OFFICES OF DALE K. GALIPO

s/ Dale Galipo

Dale Galipo, Esq.
Eric Valenzuela, Esq.
21800 Burbank Boulevard, Suite 310
Woodland Hills, California 91367
dalekgalipo@yahoo.com
evalenzuela@yahoo.com
Counsel for Plaintiff

DATED: 07/27/2021

MCNUTT LAW FIRM. P.C.

s/ Daniel R. McNutt

Daniel R. McNutt, Esq.
Matthew C. Wolf, Esq.
625 S. 8th Street
Las Vegas, Nevada 89101
drm@mcnuttlawfirm.com
mcw@mcnuttlawfirm.com
Counsel for Defendant Squeo

Order

IT IS SO ORDERED

DATED: 6:20 pm, July 29, 2021



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE